

PROMO



vijay k. toke
vijay@cobaltlaw.com
510.841.9800

VIA E-FILING

August 28, 2015

Judge Cathy Seibel
United States District Court Judge
The Hon. Charles L. Brieant Jr. Federal Building
And United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

RE: *The Wave Studio, LLC v. General Hotel Management Ltd., et al.*
Case No. 7:13-cv-09239 (CS)


Dear Judge Seibel:

We write at the request of Magistrate Judge Davison. The parties have been meeting and conferring regarding depositions and written discovery over the past several weeks and have made significant progress. The deposition of Plaintiff is scheduled to be completed on September 9, 2015 in New York, and the depositions of GHM and a third party witness being produced by GHM will take place in Singapore on September 22 and 23. The parties also intend to serve follow up written discovery following these depositions. Accordingly, Judge Davison has extended the fact discovery cutoff as to the threshold GHM issue until November 20, 2015.

The court has set a Status Conference for September 17, 2015. In light of the continued discovery cutoff, the parties request that the Court continue the Status Conference until December 3, 2015.

Respectfully submitted,

COBALT LLP



Vijay K. Toke

Counsel for Plaintiff The Wave Studio, LLC

cc: Hon. Paul E. Davison